

Message

From: Garvey, Megan [garvey.megan@epa.gov]
Sent: 9/21/2018 10:40:03 PM
To: Beeler, Cindy [Beeler.Cindy@epa.gov]
Subject: FW: NSPS OOOOa - WY LDAR program evaluation
Attachments: equivalency_of_state_fugitive_emissions_programs_for_well_sites_and_compressor_stations.pdf

Cindy,

I left a VM for Nancy Vehr yesterday. I'll let you know when she and I connect. I plan on calling Dave Glatt or Jim Semerad at ND too.

Here's the note I sent Doug – per my very brief review of the equivalency memo.

Megan

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From: Garvey, Megan
Sent: Thursday, September 20, 2018 5:22 PM
To: Benevento, Douglas <benevento.douglas@epa.gov>
Subject: NSPS OOOOa - WY LDAR program evaluation

Doug,

Attached is the EPA Memo comparing state LDAR program requirements to the proposed revisions to NSPS OOOOa. This Memo was released with the proposal last week (Sept. 11).

In sum, EPA found Wyoming's LDAR program (for the Upper Green River Basin) to be "too flexible" to be deemed equivalent to OOOOa.

For example, WY's regulations do not specify when an operator must first attempt to repair a leaking component, when final repair must be completed and when that component must be resurveyed to confirm repair. OOOOa provides specific requirements (timeframes) for these elements.

Side note: For ND (and as we discussed), the "temporary nature" of the Global CDs prevented ND's program from being equivalent to the proposed federal program.

Let me know if you have questions.

Text from the attached report

5.14 Wyoming

The Wyoming Department of Environmental Quality (Wyoming DEQ) issued regulations in June 2015 for existing (as of January 1, 2014) PAD facilities (locations where more than one well and/or associated production equipment are located, where some or all production equipment is shared by more than one well or where well streams from more than one well are

routed through individual production trains at the same location), single-well oil and gas production facilities or sources, and all compressor stations that are located in the Upper Green River Basin (UGRB) ozone nonattainment area.

The Wyoming DEQ rule requires operators with fugitive emissions greater than or equal to 4 tpy of VOC to develop and implement an LDAR protocol. The deadline for development of this protocol was January 1, 2017. Operators are required to monitor components (flanges, connectors (other than flanges), OELs, pumps, valves, and “other” components listed in Table 2-4 of the EPA’s Protocol for Equipment Leak Emissions Estimates) quarterly using a combination of Method 21, OGI, other instrument based technologies, or AVO inspections. No specific repair deadlines are included in the regulation. Table 25 provides a summary of the criteria evaluated for equivalency and determination of equivalency of Wyoming’s fugitive emissions requirements to the 2018 Proposal. However, due to the flexibility of the requirements, we are unable to include alternative fugitive standards relative to these requirements.

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